

BEFORE THE TENNESSEE REGULATORY AUTHORITY

TESTIMONY OF KING C. TIMMONS

ON BEHALF OF

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, LLC

AND TCG MIDSOUTH, INC.

DOCKET NO. 97-00309

JULY 9, 2002

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 **A. My name is King C. Timmons. My business address is 1200 Peachtree Street,**
3 Suite 8100, Atlanta, Georgia 30309.

4 **Q. PLEASE DESCRIBE YOUR BACKGROUND AND PROFESSIONAL**
5 **EXPERIENCE AS THEY RELATE TO THE ISSUES IN THIS**
6 **PROCEEDING.**

7 **A. My education and relevant work experience are as follows. I received a**
8 Bachelor's degree in Industrial and Systems Engineering from the Georgia
9 Institute of Technology in 1997. In August 2002, I will receive a Master's degree
10 in Business Administration with a concentration in Information Systems from
11 Georgia State University. I have been employed with AT&T since 1997. I began
12 my career in the Network Engineering and Inventory Support group within
13 AT&T's Network Services organization. In May 2000, I began working in the
14 Local Services Access Management division as a Performance Measurements
15 Manager. In this capacity, I am responsible for managing BellSouth's
16 performance in support of local products and services. I monitor and analyze

1 BellSouth's self-reported performance data to ensure the accuracy of the data and
2 to ensure that BellSouth provides AT&T with a level of service that meets or
3 exceeds the agreed upon benchmarks and retail analogs.

4 **Q. HAVE YOU PREVIOUSLY PARTICIPATED IN OTHER PROCEEDINGS**
5 **THAT RELATE TO THIS PROCEEDING?**

6 **A.** Yes. I have appeared in state workshops in Florida and Georgia that covered a
7 wide range of topics including performance measures and third-party testing. I
8 also have testified before the Kentucky Public Service Commission.

9 **Q. PLEASE SUMMARIZE YOUR TESTIMONY CONCERNING DATA**
10 **INTEGRITY.**

11 **A.** I am testifying on behalf of AT&T Communications of the South Central States,
12 LLC and TCG MidSouth, Inc. (collectively "AT&T") to present their concerns
13 regarding the integrity of BellSouth's performance reporting and the underlying
14 data from which the performance reports provided to Competing Local Exchange
15 Carriers ("CLECs") and the Tennessee Regulatory Authority (the "Authority" or
16 "TRA") are allegedly produced. BellSouth relies on self-reported performance
17 data, purportedly generated under its proposed Interim SQM Plan, in an attempt to
18 satisfy its burden under the Act. In order for the Authority to rely on BellSouth's
19 performance data and reports, BellSouth must provide the Authority reasonable
20 assurances that its self-reported data are accurate and that its performance data
21 and reports reflect BellSouth's actual performance in Tennessee. BellSouth has
22 not done so.

1 In order to evaluate the accuracy and the reliability of BellSouth's self-reported
2 data and reports, AT&T attempts to replicate BellSouth's data and reports using
3 raw data files. While BellSouth provides CLECs access to some raw data
4 transactions and records, CLECs are not given access to BellSouth's truly raw
5 data because BellSouth applies both documented and undocumented exclusions to
6 the data before giving CLECs access. Without access to the truly raw data,
7 CLECs cannot properly evaluate whether BellSouth's performance data and
8 reports capture BellSouth's actual performance. Another means of evaluating the
9 accuracy of BellSouth's data is to compare data for different measures or fields
10 that should provide similar data. As I explain further in my testimony,
11 undocumented exclusions and business rules make this task extremely difficult.

12 My testimony also outlines discrepancies in BellSouth's performance data that
13 demonstrate BellSouth's data and reports are unreliable. These discrepancies
14 show that BellSouth's data and reports do not reflect BellSouth's actual
15 performance in Tennessee. These discrepancies may result in reports that show
16 satisfactory results when BellSouth's performance is not satisfactory. Moreover,
17 when AT&T finds a discrepancy BellSouth is uncooperative and unresponsive to
18 AT&T's attempts to resolve the issue. AT&T is not alone in its concerns
19 regarding the reliability of BellSouth's data. The third-party tests conducted in
20 Georgia and Florida have identified similar data integrity issues.

21 For these reasons, the Authority cannot rely on BellSouth's self-reported
22 performance data (data attached to BellSouth witness Alphonso J. Varner's Direct
23 Testimony filed April 26, 2002) for purposes of evaluating BellSouth's

1 performance in Tennessee under Section 271 of the Telecommunications Act of
2 1996 (the “Act”). BellSouth’s data should be subjected to significantly more
3 scrutiny before either CLECs or this Authority can rely on it.

4 **Q. HOW DOES YOUR TESTIMONY DIFFER FROM THE TESTIMONY OF**
5 **CHERYL BURSH?**

6 **A.** The testimony of Cheryl Bursh discusses why the Authority should not make any
7 compliance determination in this docket until BellSouth submits performance
8 reports and data prepared in accordance with the Service Quality Measurement
9 Plan (“SQM”) approved by the Authority. Ms. Bursh also explains how
10 BellSouth’s proposed Interim SQM Plan differs from the Plan approved by this
11 Authority and the Plan ordered by the Georgia Public Service Commission. In
12 contrast, my testimony outlines AT&T’s concerns regarding BellSouth’s
13 production of performance data and reports under the proposed Interim SQM.
14 My testimony focuses on the performance data and reports BellSouth has
15 submitted to the Authority or that are available on BellSouth’s website.

16 **Q. WHY IS DATA INTEGRITY IMPORTANT?**

17 **A.** BellSouth has the burden of establishing that each and every requirement of
18 Section 271 has been satisfied.¹ In its attempt to satisfy this burden, BellSouth

¹ See., e.g., Memorandum and Order, *In the Matter of Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, As Amended, to Provide In-Region, InterLATA Services in Michigan*, 12 FCC Rcd. 20,543 (F.C.C. August 19, 1997) (No. CC 97-137, FCC 97-298) (“*Ameritech Michigan Order*”) ¶ 43 (finding that “the ultimate burden of proof with respect to factual issues remains at all times with the BOC”), ¶ 158 (noting that the BOC “has the burden of demonstrating that it has met all of the requirements of Section 271,” including that “it provides nondiscriminatory access to all OSS functions”); Memorandum Opinion and Order, *Application by BellSouth Corp., et al. For Provision of In-Region, InterLATA Services in South Carolina*, 13 FCC Rcd. 539 (F.C.C. Dec. 24, 1997) (No. CC 97-208, FCC 97-418) (“*South Carolina Order*”) ¶ 37 (determining that “the BOC applicant retains at all times the ultimate burden of proof that its application is sufficient”) (footnote omitted).

1 relies upon its self-reported performance data provided in its SQM reports and
2 available in its Performance Measures and Analysis Platform (“PMAP”). Before
3 this Authority can rely on BellSouth’s self-reported data to determine checklist
4 compliance, however, BellSouth must provide “reasonable assurance that the
5 reported data is accurate.”²

6 **Q. HAS BELL SOUTH PRESENTED SELF-REPORTED PERFORMANCE**
7 **DATA?**

8 **A.** Yes. In an effort to establish compliance with Section 271’s fourteen-point
9 competitive checklist, BellSouth witness Varner has provided the Authority with
10 performance data for July 2001 through January 2002 and an analysis of what the
11 data shows for each checklist item for November 2001, December 2001, and
12 January 2002.³

13 **Q. DOES BELL SOUTH’S SELF-REPORTED DATA DEMONSTRATE THAT**
14 **BELL SOUTH HAS MET ITS BURDEN UNDER THE ACT?**

15 **A.** No. In order to establish that it offers nondiscriminatory access to its network,
16 BellSouth must demonstrate that the self-reported data upon which it relies is
17 *accurate and trustworthy*. BellSouth has not done so.

² Memorandum and Order, *In the Matter of Application By Bell Atlantic New York for Authorization under Section 271 of the Communication Act to Provide In-Region, InterLATA Service in the State of New York*, 15 FCC Rcd. 3953 (F.C.C. Dec. 22, 1999) (No. CC 99-295, FCC 99-404) (“*Bell Atlantic New York Order*”) ¶ 433. This requirement, stated in the context of public interest review of a performance monitoring plan, applies at least equally to BellSouth’s proffer of its own data to prove checklist compliance.

³ See Direct Testimony of Alphonso J. Varner (“*Varner Direct*”), filed April 26, 2002, at 2-3.

- 1 **Q. PUTTING ASIDE YOUR CONCERNS REGARDING THE RELIABILITY**
2 **OF BELL SOUTH'S DATA AND REPORTS FOR JUST A MOMENT,**
3 **DOES THE DATA BELL SOUTH SUBMITTED TO THE AUTHORITY**
4 **DEMONSTRATE BELL SOUTH PERFORMS SATISFACTORILY IN**
5 **TENNESSEE?**
- 6 **A. No. BellSouth's Monthly State Summary ("MSS") reports for Tennessee**
7 continue to show deficient performance. As I explain in further detail in
8 Section IV, my analysis shows that BellSouth's performance declined between
9 January and March 2002 for 27% of the sub-metrics reported in the MSS, and
10 declined significantly for 17% of those sub-metrics. Moreover, BellSouth failed
11 to provide sufficient evidence of performance in Tennessee for 72% of the sub-
12 metrics reported in its MSS report for January 2002 because there was no data or
13 statistically inconclusive data for those sub-metrics.
- 14 **Q. HOW IS THE REMAINDER OF YOUR TESTIMONY ORGANIZED?**
- 15 **A. My testimony is organized as follows:**
- 16 I. BellSouth's Data Collection and Reporting Systems
- 17 A. BellSouth Does Not Provide All Appropriate Data to CLECs And
18 The Authority
- 19 B. BellSouth Unilaterally Determines The Data It Reports By
20 Applying Undocumented Exclusions To The Data Files
- 21 C. BellSouth Unilaterally Makes Changes To Its Performance Metrics
22
- 23 II. BellSouth's Self-Reported Data Are Unreliable
- 24 A. BellSouth's Performance Data And Reports Do Not Reflect
25 BellSouth's Actual Performance In Tennessee
- 26 B. Discrepancies May Result In Performance Reports That Show
27 Satisfactory Results When BellSouth's Performance Is Not
28 Satisfactory

1 C. BellSouth Is Uncooperative And Unresponsive When AT&T
2 Attempts To Resolve Discrepancies In BellSouth's Data

3 III. Third-Party Audits Have Raised Questions Concerning The Reliability of
4 BellSouth's Data

5 IV. BellSouth's Self-Reported Data Reveal Deficient Performance

6 **I. BELLSOUTH'S DATA COLLECTION AND REPORTING SYSTEMS**

7 **Q. PLEASE EXPLAIN HOW BELLSOUTH'S DATA COLLECTION AND**
8 **REPORTING SYSTEMS WORK.**

9 **A.** To explain how these systems work, I will refer to Exhibit KCT-1 attached to my
10 testimony. Exhibit KCT-1 is a graphic representation of BellSouth's data
11 collection process that was included in BellSouth's March 22, 2002 filing to the
12 Georgia Public Service Commission in which BellSouth described upgrades it
13 was making to PMAP.⁴ Exhibit KCT-1 shows the different stages of BellSouth's
14 data collection system under both the old system, PMAP 2.6, and the newer
15 system PMAP 4.0. BellSouth has indicated that "the fundamental process [it
16 uses] in reporting its performance (i.e. sourcing of data, application of business
17 rules, the production of reports and output distribution) will remain substantially
18 unchanged" with the implementation of PMAP 4.0. Exhibit KCT-2, *Evolution*
19 *and Implementation of PMAP 4.0*, filed with the Georgia Public Service
20 Commission, Dckt. Nos. 8354-U & 7892-U, at 2 (March 22, 2002).

21 Under PMAP 4.0, the version of PMAP now being used on BellSouth's website,
22 BellSouth's legacy systems feed data into the Regulatory Ad-hoc Database
23 System (RADS). BellSouth refers to this data as "early stage data." The early

1 stage data is then processed before it is sent to the PMAP Warehouse (the
2 database icon at the far right hand side of the page). The PMAP Warehouse
3 contains the information available in BellSouth's PMAP. These data are used to
4 produce the SQM reports and what BellSouth refers to as the "raw data files" that
5 are available in PMAP.

6 **Q. DO BELL SOUTH'S RAW DATA FILES IN PMAP CONTAIN ALL OF**
7 **BELL SOUTH'S DATA?**

8 **A.** No. The "raw data files" available in PMAP do not contain raw, *unprocessed*
9 data. The data available in PMAP are processed such that some data are excluded
10 before the files are compiled for the calculation of a particular report. The truly
11 raw data – all data relating to CLEC transactions – is not currently available to
12 CLECs.

13 **A. BellSouth Does Not Provide All Appropriate Data to CLECs And The**
14 **Authority**

15 **Q. HAS BELL SOUTH PROVIDED APPROPRIATE RAW DATA TO**
16 **CLECS?**

17 **A.** No. BellSouth does not provide the raw data transactions or records for all local
18 service requests ("LSRs") that fall within documented or undocumented
19 exclusions from its performance measures. BellSouth's Raw Data Users Manual
20 provides a series of exclusions that are required before a report can be reproduced.
21 Many other exclusions, however, are applied to the data before CLECs are
22 allowed access. Thus, BellSouth picks and chooses what "raw data" it will

⁴ Before the Georgia Public Service Commission, *In re: Investigation Into Development of Electronic Interfaces for BellSouth's Operations Support Systems*, Dckt. No. 8354-U, *Performance Measurements for Telecommunications Interconnection, Unbundling and Resale*, Dckt. No. 7892-U (March 22, 2002).

1 provide. Although BellSouth provides the underlying data files for all CLEC-
2 specific reports it produces, BellSouth does not provide the raw data transactions
3 or records for the LSRs that are excluded from those reports because they are
4 excluded from BellSouth's performance measures.

5 **Q. WHY DO CLECS NEED ACCESS TO "UNPROCESSED DATA"?**

6 **A.** BellSouth's unprocessed data reflects all of BellSouth's transactions with CLECs.
7 None of the data have been excluded. In contrast, the data that appear in the "raw
8 data files" in PMAP are only those data used to generate the reports. Other data
9 have been excluded. Without access to the truly raw data files, AT&T, other
10 CLECs, and the Authority cannot verify the accuracy of BellSouth's performance
11 monitoring reports or evaluate discrepancies in BellSouth's reports.

12 **Q. HAS BELLSOUTH RECENTLY AGREED TO PROVIDE TRULY RAW**
13 **DATA FILES TO CLECS?**

14 **A.** It is unclear. BellSouth has repeatedly denied CLECs' requests for access to the
15 raw data files for the LSRs excluded from its performance measures, in a variety
16 of regulatory forums. BellSouth claims, for the first time in its response to CLEC
17 discovery requests in this docket, that it is developing the capability to produce all
18 the underlying data for its reports, including excluded data files. According to
19 BellSouth's response to Consolidated CLEC 1st Data Request Item No. 38,
20 "BellSouth is developing the capability to produce supporting data files that
21 include all data used in the report *or excluded from the report* by the SQMP that
22 exists in the PMAP Warehouse." (Exhibit KCT-3 (emphasis added).)

1 **Q. HAS BELL SOUTH’S NEW POLICY BEEN IMPLEMENTED?**

2 **A.** BellSouth’s discovery response of May 23, 2002 to Data Request Item No. 38
3 was AT&T’s first notification that BellSouth has changed its policy regarding the
4 provision of underlying raw data files. (*See* Exhibit KCT-3.) According to its
5 discovery response, “BellSouth will furnish to a requesting CLEC three months
6 each year the SQMP Supporting Data Files and files with the data listed in the
7 Exclusion Section of that state’s SQMP.” (*Id.*) BellSouth indicates that it is
8 “developing this capability” but gives no timeline for completion. Moreover, it is
9 unclear why BellSouth believes that three months data is adequate to serve
10 CLECs’ needs, whether the three months BellSouth plans to provide are three
11 consecutive months data, or whether the CLEC or BellSouth will choose which
12 three months data will be provided.

13 Regardless of BellSouth’s apparent shift in policy, to date BellSouth has not
14 provided AT&T with truly raw data files. Nor has BellSouth issued business
15 rules or had discussions with AT&T regarding the mechanics of its new policy.
16 Without access to BellSouth’s underlying raw data AT&T, other CLECs, and the
17 Authority cannot properly analyze BellSouth’s data for discrepancies or validate
18 BellSouth’s reports.

19 **B. BellSouth Unilaterally Determines The Data It Reports By Applying**
20 **Undocumented Exclusions To The Data Files**

21 **Q. DOES BELL SOUTH CURRENTLY LIMIT CLECS’ ACCESS TO RAW**
22 **DATA FILES?**

23 **A.** Yes. In order to verify the accuracy of BellSouth’s performance reports, CLECs
24 compare performance reports that should have similar data in order to uncover

1 any discrepancies. BellSouth's SQM serves as an official guide for the CLECs in
2 making these comparisons. The SQM is BellSouth's official document, created
3 and modified as a result of past hearings and workshops before various state
4 regulatory bodies. Some exclusions are listed in the BellSouth SQM and in the
5 Raw Data User Manual, but BellSouth also excludes data without documenting
6 the exclusions. These undocumented exclusions are not part of the SQM and are
7 therefore unauthorized omissions from BellSouth's performance reporting.

8 **Q. HAS BELL SOUTH EXPLAINED, IN ANY INFORMATION AVAILABLE**
9 **TO CLECS, WHAT DATA IT EXCLUDES FROM PMAP?**

10 **A.** No. In order to understand what data are available to verify the accuracy of
11 BellSouth's reports, CLECs have asked BellSouth in proceedings before various
12 state regulatory bodies what data are included in the PMAP raw data files. As a
13 result of the responses given by BellSouth, CLECs have acquired some
14 knowledge of what undocumented exclusions BellSouth applies to its data.
15 However, because many of the exclusions BellSouth applies, and their associated
16 business rules, remain undocumented in BellSouth's SQM, neither the Authority
17 nor CLECs can be sure that each and every unauthorized exclusion has been
18 revealed. BellSouth's responses to Consolidated CLEC 1st Data Request Item
19 Nos. 29-36 in this docket, attached as Exhibits KCT-4 through KCT-11, include
20 examples of documented exclusions as well as undocumented exclusions. For
21 instance, according to Data Request Item No. 29 BellSouth excludes LSRs where
22 a product code could not be identified and LSRs for which a state was not
23 identified from the % Rejected LSRs in PMAP. (See Exhibit KCT-4.) These
24 exclusions are not documented.

1 **Q. WHY DO THESE EXCLUSIONS MATTER?**

2 **A.** If excluded data are not reported and evaluated, service performance deficiencies
3 may be hidden from CLECs and the Authority. As a result of these exclusions,
4 hundreds of service orders will not be measured pursuant to an approved SQM
5 and will not be included in BellSouth's performance reports. By excluding data,
6 BellSouth is *unilaterally* determining what data is available to the Authority and
7 CLECs. Accordingly, CLECs have been deprived of the opportunity to raise their
8 concerns regarding a particular exclusion and the Authority has been denied an
9 opportunity to decide the appropriateness of the exclusion. Moreover, regardless
10 of the propriety of a particular exclusion, without documentation of the exclusion
11 and its associated business rules, CLECs cannot determine whether BellSouth is
12 appropriately applying the exclusion and therefore cannot verify the accuracy of
13 BellSouth's reports. Without complete and accurate data, neither the Authority
14 nor CLECs can appropriately evaluate whether BellSouth is satisfying its
15 obligation to provide nondiscriminatory access to local services.

16 **Q. HOW DO UNDOCUMENTED EXCLUSIONS IMPACT CLECS' ABILITY**
17 **TO VERIFY THE ACCURACY OF BELL SOUTH'S PERFORMANCE**
18 **REPORTING?**

19 **A.** Logically, CLECs and the Authority should be able to compare similar reports,
20 using BellSouth's SQM and Raw Data Users Manual for guidance, and get
21 similar results. AT&T, however, has discovered many instances where numbers
22 that should be comparable are drastically different. These gaps in the data call
23 into question the accuracy of BellSouth's reports.

1 **Q. PLEASE PROVIDE AN EXAMPLE.**

2 **A.** According to BellSouth's discovery response to Item No. 29, data for the %
3 Rejected LSRs – Total Mechanized measure reported on PMAP is missing critical
4 information. (*See* Exhibit KCT-4.) This measure provides the percentage of
5 LSRs submitted electronically that are rejected by BellSouth. BellSouth excludes
6 LSRs for which a product code could not be identified, and LSRs for which a
7 state was not identified from the denominator of its calculation of the % Rejected
8 LSRs – Total Mechanized measure in PMAP. These exclusions are not
9 documented in BellSouth's SQM. Each of these items is included in the Total
10 Mech LSRs field in the Flow-Through Report.

11 **Q. PLEASE EXPLAIN THE IMPACT OF THESE UNDOCUMENTED**
12 **EXCLUSIONS.**

13 **A.** Logically, CLECs should be able to compare the denominator of the % Rejected
14 LSRs to the total Mech LSRs field in the Flow-Through Report in order to verify
15 the accuracy of BellSouth's data. Without documentation regarding the
16 exclusions discussed above and the precise business rules that govern their
17 application, CLECs cannot compare what is reported in PMAP with the Flow-
18 Through Report. As a result, neither CLECs nor the Authority can properly
19 evaluate the accuracy of BellSouth's performance reporting.

20 **Q. DO BELL SOUTH'S BUSINESS RULES EXPLAIN THESE**
21 **EXCLUSIONS?**

22 **A.** No, BellSouth's SQM contains only some of the exclusions. For instance, in
23 response to discovery Item No. 30, BellSouth indicated that the Total Mechanized

1 LSRs field reported in the LNP Flow-Through Report includes all LSRs that meet
2 the following conditions: (1) the LSR was received by the LNP Gateway in the
3 reporting month; and (2) the LSR received a Clarification or FOC “by the time the
4 snapshot of the data is taken.” (Exhibit KCT-5.)⁵ These rules are not documented
5 in the SQM. Because these business rules are undocumented in BellSouth’s
6 SQM, CLECs and the Authority cannot verify the accuracy of BellSouth’s
7 reports.

8 **Q. ARE THERE IMPORTANT AREAS IN WHICH BELL SOUTH’S DATA**
9 **INTEGRITY ARE AFFECTED BY THE UNAUTHORIZED**
10 **EXCLUSIONS THAT AT&T IS PRESENTLY AWARE OF?**

11 **A.** Yes. AT&T has identified several areas in which BellSouth has unilaterally
12 decided to exclude data from certain performance measurement reports. For
13 example, the following undocumented exclusions and business rules impact data
14 integrity:

- 15 • LSRs received by the LNP Gateway in the reporting month, but that
16 receive a Clarification or FOC after the “snapshot of data is taken” are not
17 reported in the LNP Flow-through report for Total Mech LSRs for that
18 month. (Exhibit KCT-4.) According to these undocumented business
19 rules, an LSR that receives a Clarification or FOC “after the snapshot of
20 data is taken” will not be reported in the next month’s data as well. It is
21 unclear what happens to that particular LSR. Moreover, the time frame
22 for the “snapshot of data” is not defined, nor is the method for determining

⁵ In addition to being undocumented, these business rules were not included in BellSouth’s discovery response regarding the non-LNP flow-through report for Item No. 29. (Exhibit KCT-4.) Logically, the

1 this timeframe disclosed. All of this information is critical to CLECs'
2 analysis of BellSouth's performance reporting.

- 3 • According to BellSouth's undocumented business rules, LSRs received in
4 previous months are consistently excluded from the Flow Through Report
5 and the LNP Flow Through Report. (*See Exhibits KCT-6 through KCT-*
6 11.) As a result, LSRs are either not reported at all or reported in a
7 different month. Either way, BellSouth's Flow-Through Reports are not
8 reliable indicators of its actual performance.

- 9 • BellSouth admits that undocumented exclusions and parameters in the
10 logic used to calculate LNP Flow-Through Auto-Clarifications have
11 resulted in LSRs which may have been clarified by a BellSouth Service
12 Representative or LSRs that fell out for manual processing being included
13 in the LNP Flow-Through Auto-Clarifications field. (*See Exhibit KCT-7.*)
14 This is inappropriate because an LSR that is clarified by a service
15 representative or that falls out for manual handling is not "auto-clarified."

- 16 • BellSouth also admits that undocumented exclusions and parameters in the
17 logic used to calculate LNP Flow-Through Issued Service Orders can
18 result in a manually generated LSR being counted in LNP Flow-Through
19 Issued Service Orders. (*See Exhibit KCT-11.*) Any such instance directly
20 contradicts the definition for the Flow-Through Report provided in
21 BellSouth's published business rules. The Flow-Through Report is
22 defined as the percentage of non-LNP LSRs and LNP LSRs "submitted

LNP flow-through report and the non-LNP flow-through report should have the same business rules. It is unclear whether or not they do.

electronically . . . that flow through and reach a status for a FOC to be issued, without manual intervention.” (Exhibit KCT-12.)

Without full access to BellSouth’s undocumented exclusions and business rules, neither the Authority nor CLECs can properly analyze BellSouth’s performance reporting.

C. BellSouth Unilaterally Makes Changes To Its Performance Metrics

Q. DOES BELL SOUTH MAKE CHANGES TO THE WAY IT CALCULATES ITS PERFORMANCE MEASURES?

A. Yes. In May and June 2002 BellSouth made no less than twenty-four (24) changes to the way it calculates its performance measurements. These changes will impact the performance measurement data provided to the Authority and CLECs.

Q. DID BELL SOUTH GIVE CLECS THE OPPORTUNITY TO COMMENT ON THESE CHANGES BEFORE THEY WERE MADE?

A. No. On May 23 and June 4, 2002, BellSouth filed “notices” with the Georgia Public Service Commission indicating that certain changes were being made to BellSouth’s performance measurement calculations as a result of BellSouth changing over to PMAP 4.0. (See Exhibit KCT-13.) These notices were insufficient. First, the notices were *not* made in advance of the changes. BellSouth indicated that the changes would be used to generate performance results for April data. On May 23, 2002, the date of the first “notice,” BellSouth had already posted preliminary April data. Second, the “notices” also did not contain the kind of detailed information necessary for CLECs to determine the impact of the changes. For example, BellSouth indicated that it was

1 implementing an “improved method” for assigning CLEC resale and trouble
2 tickets and lines to various product categories. Details concerning this “improved
3 method” were not provided.

4 **Q. DID BELLSOUTH OBTAIN APPROVAL FROM THE GEORGIA**
5 **COMMISSION BEFORE CHANGING ITS PERFORMANCE**
6 **MEASURES?**

7 **A.** No. BellSouth did not obtain approval from the GPSC before implementing these
8 changes despite the fact that an open docket exists in Georgia for obtaining
9 Commission approval prior to making just such changes. Without Commission
10 approval and despite CLECs raising serious concerns over this very issue in
11 workshops in Georgia – BellSouth implemented unauthorized, unilateral changes
12 to the way it calculates its performance measures. In fact, the Southeastern
13 Competitive Carriers Association (“SECCA”) filed an emergency Motion to
14 Establish a Procedure For Implementation of Changes to the Service Quality
15 Measures. (*See* Exhibit KCT -14.) While this Motion was resolved by the GPSC,
16 it remains unclear if implementation of the resolution will adequately address
17 CLECs’ needs.

18 **Q. HOW DO BELLSOUTH’S UNAUTHORIZED, UNILATERAL CHANGES**
19 **TO ITS PERFORMANCE MEASUREMENT CALCULATIONS IMPACT**
20 **DATA INTEGRITY?**

21 **A.** CLECs need information detailing a proposed change to BellSouth’s performance
22 measurement calculations in advance of the change being implemented. Without
23 this information, CLECs cannot determine the impact of the change and whether
24 the change is reasonable and necessary. For example, of the twenty-four (24)
25 changes BellSouth recently implemented, no less than twelve (12) of those

1 changes were due to data integrity issues. AT&T and the other CLECs, however,
2 were not given the opportunity to discuss those changes prior to the changes being
3 made. This incident serves as another example of BellSouth unilaterally deciding
4 exactly what information the Authority and CLECs will receive to evaluate
5 BellSouth's performance.

6 **Q. WHAT STEPS SHOULD BELL SOUTH TAKE IN ORDER TO CHANGE**
7 **ITS PERFORMANCE MEASUREMENT CALCULATIONS?**

8 **A.** Most importantly, BellSouth should be required to obtain approval from the
9 Authority before it implements any changes to its performance measurement
10 calculations. BellSouth should be required to give a prior detailed notice of the
11 changes to CLECs and the Authority. CLECs should have at least 60 days to
12 review the proposed changes and be given an opportunity to comment.

13 **Q. IS THERE ANYTHING ELSE THAT WOULD ASSIST CLECS IN**
14 **EVALUATING PROPOSED CHANGES TO BELL SOUTH'S**
15 **PERFORMANCE MEASUREMENT CALCULATIONS?**

16 **A.** Yes. CLECs should have access to BellSouth's metrics change management
17 tracking database which contains proposed changes to BellSouth's performance
18 measurement calculations and access to BellSouth's internal change control
19 meetings for performance measurements. As part of the Georgia Third-party OSS
20 test, KPMG evaluated BellSouth's change control process and found that CLECs
21 are excluded entirely from the process for performance measures. (See Exhibit
22 KCT-15, *Supplemental Test Plan Final Report*, March 20, 2001, VIII-C-I.)
23 KPMG found that the change control process would be improved by involving
24 CLECs in meetings of the Change Control Board and giving CLECs access to

1 BellSouth's metrics change management tracking database. This database could
2 be posted on BellSouth's PMAP website.

3 **II. BELLSOUTH'S SELF-REPORTED DATA ARE UNRELIABLE**

4 **A. BellSouth's Performance Data And Reports Do Not Reflect**
5 **BellSouth's Actual Performance In Tennessee**

6 **Q. DOES BELLSOUTH'S REPORTING CAPTURE ALL RELEVANT DATA**
7 **FOR THE AVERAGE COMPLETION NOTICE INTERVAL MEASURE?**

8 **A.** No. BellSouth does not include data for orders where a completion notice is
9 issued in one month but the order was completed in a previous month in its
10 Average Completion Notice Interval measure and the associated raw data.

11 **Q. HAS AT&T BROUGHT THIS ISSUE TO BELLSOUTH'S ATTENTION**
12 **BEFORE?**

13 **A.** Yes. AT&T has raised this issue with BellSouth in workshops conducted in
14 Georgia in December 2001.

15 **Q. HAS BELLSOUTH RESPONDED TO AT&T'S CONCERN?**

16 **A.** BellSouth acknowledged this issue in a letter from Bennett Ross to K.C. Timmons
17 on January 21, 2002, attached as Exhibit KCT-16. BellSouth referred to this issue
18 as a "completion date grouping issue." (*Id.* at 5.) BellSouth attributes this
19 problem to incidents of transactions being "closed toward the end of a given
20 calendar month when technicians and field representatives fail to submit the
21 paperwork or successfully close out or post the orders in a timely manner." (*Id.*)

1 **Q. HAS BELL SOUTH FIXED THIS PROBLEM?**

2 **A.** No. According to BellSouth's response to Data Request Item No. 21 in this
3 docket, "[t]his issue is expected to be implemented with July 2002 data." (Exhibit
4 KCT-17.) BellSouth previously indicated in Georgia that it planned a release to
5 address this issue which would be implemented with March or April data. (See
6 Exhibit KCT-16.)

7 **Q. HAVE YOU IDENTIFIED OTHER INSTANCES WHERE BELL SOUTH'S**
8 **PERFORMANCE DATA AND REPORTS DO NOT REFLECT**
9 **BELL SOUTH'S ACTUAL PERFORMANCE IN TENNESSEE?**

10 **A.** Yes. Analysis of BellSouth's Order Completion Interval data indicates that 4,174
11 completion notices have no corresponding data regarding the completed orders.

12 **Q. WHY IS THIS IMPORTANT?**

13 **A.** This discrepancy could mean one of two things – either these 4,174 completion
14 notices are not actually completion notices, or BellSouth has excluded the data for
15 the corresponding completed orders. Either way, BellSouth's data is not accurate.

16 **Q. PLEASE DESCRIBE ANY OTHER INSTANCES WHERE BELL SOUTH'S**
17 **PERFORMANCE REPORTS DO NOT REFLECT ITS ACTUAL**
18 **PERFORMANCE.**

19 **A.** BellSouth appears to exclude LSRs from its Flow-Through Report unless the
20 LSRs were received in the reporting month and received a Clarification or a FOC
21 within the same month. (See Exhibits KCT-6 through KCT-11.)

22 **Q. WAS AT&T AWARE THAT BELL SOUTH WAS EXCLUDING LSRS**
23 **FROM ITS FLOW-THROUGH REPORT?**

24 **A.** No. This exclusion is undocumented. AT&T learned for the first time from
25 BellSouth's response to Data Request Item No. 31, that BellSouth excludes LSRs

1 from its reporting for Flow-Through Auto-Clarifications if they were received in
2 the previous month. (See Exhibit KCT-6.) Responses to discovery requests
3 further indicate that LSRs received in the previous month are also excluded from
4 BellSouth's reporting of LNP Flow-Through Auto-Clarifications, CLEC Caused
5 Fallout of the Flow-Through Report and the LNP Flow-Through Report, and
6 Issued Service Orders for the Flow-Through Report and the LNP Flow-Through
7 Report. (See Exhibits KCT-7 through KCT-11.)

8 **Q. ARE OTHER LSRS EXCLUDED FROM BELL SOUTH'S FLOW-**
9 **THROUGH REPORT?**

10 **A.** Yes. BellSouth indicated in its response to Data Request Item No. 30 that LSRs
11 are excluded from Total Mech LSRs in the LNP Flow-Through report unless the
12 LSRs are received in the reporting month and received a Clarification or FOC "by
13 the time the snapshot of the data is taken." (Exhibit KCT-5.) This exclusion is
14 also undocumented. Because this exclusion and the associated business rules are
15 undocumented in BellSouth's SQM, CLECs do not know when the "snapshot" of
16 data is taken or how this time is set.

17 **Q. PLEASE DESCRIBE ANY OTHER CONCERNS YOU HAVE THAT**
18 **BELL SOUTH'S PERFORMANCE DATA AND REPORTS DO NOT**
19 **REFLECT BELL SOUTH'S ACTUAL PERFORMANCE?**

20 **A.** BellSouth fails to report transactions handled by the Complex Services Resale
21 Support Group ("CRSG").

1 **Q. WHAT IS THE COMPLEX SERVICES RESALE SUPPORT GROUP?**

2 **A.** The CRSG is an extended branch of BellSouth's Account Team/CLEC Care
3 Team. The Account Team/CLEC Care Team is discussed further in Section II(C).
4 The CRSG processes CLEC requests for Complex Resale and Complex UNE
5 products. (*See* Exhibit KCT-18 at 6.)

6 **Q. DOES BELL SOUTH INCLUDE LSRS SUBMITTED TO THE CRSG IN**
7 **ITS PERFORMANCE MEASUREMENTS?**

8 **A.** It is not clear. BellSouth's response to Data Request Item No. 25 indicates that
9 LSRs submitted to the CRSG are reported, while BellSouth's response to
10 Exception 90 in the Florida OSS test, however, indicates that certain LSRS
11 submitted to the CRSG are not measured for FOC Timeliness.

12 **Q. WHAT DID BELL SOUTH STATE IN RESPONSE TO DATA REQUEST**
13 **ITEM NO. 25?**

14 **A.** In response to Data Request Item No. 25, attached as Exhibit KCT-19 to my
15 testimony, BellSouth stated that LSRS submitted to the CRSG "are currently
16 reported in BellSouth's SQM in the Non-Mechanized categories for Percent
17 Rejected Service Requests, Reject Interval, Firm Order Confirmation Timeliness,
18 and Firm Order Confirmation and Reject Response Completeness under the
19 following products: Resale Design (Specials), UNE Loop + Port Combinations,
20 xDSL, Local Interoffice Transport." BellSouth further indicated that xDSL and
21 Local Interoffice Transport are also reported for LSR Firm Order Confirmation
22 Response Time – Manual. (*Id.*)

1 **Q. IS BELLSOUTH’S RESPONSE TO DATA REQUEST ITEM NO. 25**
2 **CONSISTENT WITH PREVIOUS STATEMENTS?**

3 **A.** No. In Florida, KPMG Consulting issued Exception 90 to the Florida OSS test
4 because it did not receive timely Non-Mechanized FOCs from BellSouth via fax
5 and electronic mail. (*See Exhibit KCT-20.*) In its response, BellSouth indicated
6 that orders issued by the CSG are excluded from Measure 0-9 of the SQM
7 which measures FOC Timeliness for Non-Mechanized LSRs. This appears to
8 directly contradict BellSouth’s response to Data Request Item No. 25 in which
9 BellSouth stated that LSRs submitted to the CSG are currently reported in the
10 Non-Mechanized category for FOC Timeliness. (*See Exhibit KCT-19.*)

11 In its response to Exception 90 in Florida, BellSouth also indicated that LSRs
12 submitted to the CSG which require a Service Inquiry and are for xDSL or
13 unbundled interoffice transport are measured under Measure 0-10 of the SQM
14 which measures Service Inquiry with LSR FOC Response Time Manual. (*See*
15 *Exhibit KCT-20.*) Accordingly, orders that go to the CSG and do not require a
16 service inquiry, or require a service inquiry for services other than xDSL or
17 unbundled interoffice transport, are not measured for FOC Timeliness. Timely
18 FOCs are critical to CLECs’ ability to compete because delays in BellSouth
19 issuing FOCs negatively impacts CLECs’ ability to complete orders on a timely
20 basis.

1 **B. Discrepancies May Result In Performance Reports That Show**
2 **Satisfactory Results When BellSouth's Performance Is Not**
3 **Satisfactory**

4 **Q. HAVE YOU IDENTIFIED ANY WAYS IN WHICH BELL SOUTH'S**
5 **REPORTS MAY SHOW SATISFACTORY RESULTS WHEN**
6 **BELL SOUTH'S PERFORMANCE IS NOT SATISFACTORY?**

7 **A. Yes. BellSouth fails to include "Directory Listing only" service orders in the**
8 sampling it uses to calculate the % Database Update Accuracy Measure. One
9 purpose of the % Database Update Accuracy Measure is to evaluate whether
10 BellSouth accurately updates its Directory Listing database. According to
11 BellSouth's SQM, the definition of the % Database Update Accuracy measure is
12 as follows:

13 This report measures the accuracy of database updates by
14 BellSouth for Line Information Database (LIDB),
15 Directory Assistance, and *Directory Listings* using a
16 statistically valid sample of LSRs/Orders in a manual
17 review. This manual review is not conducted on BellSouth
18 Retail Orders.

19 (Exhibit KCT-21 (emphasis added).) BellSouth admitted in its response to
20 Data Request Item No. 24 that it does not include "Directory Listing only" service
21 orders in the sampling process for this measure. Thus, BellSouth is acting
22 contrary to its own published business rules.

23 **Q. PLEASE DESCRIBE ANY OTHER CONCERNS YOU HAVE THAT**
24 **BELL SOUTH'S REPORTS MAY SHOW SATISFACTORY RESULTS**
25 **WHEN BELL SOUTH'S PERFORMANCE IS NOT SATISFACTORY.**

26 **A. BellSouth generates a Monthly State Summary (MSS) performance report for**
27 CLECs and the Authority to evaluate BellSouth's performance compared to pre-
28 set performance standards. In the MSS report, BellSouth reports its performance

1 for the Mean Held Order Interval Measure. According to BellSouth's SQM:
2 "*When delays occur in completing CLEC orders*, the average period that CLEC
3 orders are held for BellSouth reasons, pending a delayed completion, should be no
4 worse for the CLEC when compared to BellSouth delayed orders. . . . This report
5 is based on orders still pending, held and past their committed due date at the
6 close of the reporting period." (Exhibit KCT-22 (emphasis added).) Under the
7 SQM, held order intervals are calculated "when delays occur." BellSouth
8 artificially inflates its performance for this interval measure by calculating a mean
9 held order interval of zero even when there are no instances of delayed orders.

10 **Q. HOW DOES BELL SOUTH DISTORT ITS PERFORMANCE FOR THE**
11 **MEAN HELD ORDERS INTERVAL MEASURE?**

12 **A.** In its response to Data Request Item No. 27, BellSouth admits that it populates the
13 equity column in its MSS report with a "Yes" for the Mean Held Service Interval
14 measure even when there was no activity for that measure. (See Exhibit KCT-
15 23.) In other words, BellSouth is crediting itself for a zero Mean Held Service
16 Interval when there were no held orders at all.

17 **Q. IS BELL SOUTH'S PRACTICE APPROPRIATE?**

18 **A.** No. According to the SQM, the Mean Held Orders Interval Measure tracks the
19 interval (in days) that orders which have passed the currently committed due date
20 are held and pending, but not completed. (See Exhibit KCT-22.) This measure
21 tracks the amount of time that held orders are held and pending, *not* the number of
22 orders that are held and pending. By giving itself credit for a short interval – zero
23 interval – when there were no held orders in the reporting period, BellSouth

1 inappropriately inflates its performance results for the Mean Held Orders Interval
2 Measure.

3 **Q. HOW SHOULD BELLSOUTH POPULATE THE MEAN HELD ORDER**
4 **INTERVAL MEASURE WHEN THERE ARE NO HELD ORDERS**
5 **DURING THE REPORTING PERIOD?**

6 **A.** When there are no held orders for the reporting period, the Mean Held Order
7 Interval Measure should be blank to reflect no activity. BellSouth has not
8 “achieved the performance standard,” *see* Exhibit KCT-23, for the Mean Held
9 Order Interval Measure when there has been no activity for the reporting period.

10 **Q. HAVE YOU IDENTIFIED ANY OTHER CONCERNS YOU HAVE THAT**
11 **BELLSOUTH’S REPORTS MAY SHOW SATISFACTORY RESULTS**
12 **WHEN BELLSOUTH’S PERFORMANCE IS NOT SATISFACTORY?**

13 **A.** Yes. BellSouth has given inconsistent answers regarding what items make up the
14 denominator of the Average Completion Notice Interval (ACNI) Measure.
15 According to BellSouth’s response to Data Request Item No. 37, the denominator
16 for the ACNI measure is made up of all completed orders which receive a notice
17 “within the reporting period.” (Exhibit KCT-24.) In contrast, in a letter from
18 Bennett Ross to me in January 2002, BellSouth indicated that it “leaves the
19 ‘processing window’ open for a few days into the following calendar month” in
20 order to capture orders that are closed toward the end of a given calendar month,
21 but do not receive completion notices until the following month. (Exhibit KCT-
22 16 at 5.)

- 1 **Q. HOW DOES BELL SOUTH'S REPORTING FOR THIS MEASURE**
2 **AFFECT ITS DATA?**
- 3 **A.** Based on the contradictory information provided by BellSouth, it is unclear how
4 BellSouth is calculating this metric and even what data it is including. As a
5 result, any reported results for this measure are suspect.
- 6 **Q. HAVE YOU IDENTIFIED ANY ADDITIONAL INSTANCES WHERE**
7 **BELL SOUTH'S PERFORMANCE REPORTS MAY BE DISTORTED?**
- 8 **A.** Yes. According to my analysis of BellSouth's March 2002 data, BellSouth is
9 overstating its LNP Flow-Through.
- 10 **Q. PLEASE EXPLAIN YOUR CONCERN THAT LNP FLOW-THROUGH IS**
11 **OVERSTATED.**
- 12 **A.** Based on BellSouth's published SQM, LNP Flow-Through for March 2002
13 should contain all of the LNP LSRs that became Issued Service Orders during the
14 month of March. Issued Service Orders are LSRs submitted electronically by a
15 CLEC using a mechanized ordering process that flow-through and reach a status
16 for a Firm Order Confirmation to be issued without any manual intervention.
17 These LNP LSRs that are Issued Service Orders should readily compare to the
18 fully mechanized LNP LSRs from the LNP FOC Timeliness raw data files.
- 19 **Q. DID YOU COMPARE AT&T'S DATA FOR ISSUED SERVICE ORDERS**
20 **FROM THE LNP LSR FLOW-THROUGH LOG TO THE FULLY**
21 **MECHANIZED LNP LSRS FROM THE LNP FOC TIMELINESS RAW**
22 **DATA FILES?**
- 23 **A.** Yes. Comparison of the two files for March 2002 shows that 725 Issued Service
24 Orders included in BellSouth's LNP LSR Flow-Through are not in the Fully
25 Mechanized LNP LSRs from the LNP FOC Timeliness raw data files. Instead,

1 these Issued Service Orders appear in the *Partially Mechanized* LNP FOC
2 Timeliness raw data file. This number is significant – 13% of the 5,482 Issued
3 Service Orders in the LNP LSR Flow Through Log.

4 **Q. WHY IS THIS DISCREPANCY IMPORTANT?**

5 **A.** This discrepancy suggests one of two things – BellSouth is either incorrectly
6 categorizing Partially Mechanized LSRs in the LNP Flow-Through Report as
7 flow-through orders or BellSouth is miscategorizing Fully Mechanized LSRs as
8 Partially Mechanized LSRs in the FOC Timeliness Report.

9 **Q. WHAT WOULD BE THE IMPACT OF INCLUDING PARTIALLY**
10 **MECHANIZED LSRS IN THE LNP FLOW-THROUGH REPORT?**

11 **A.** Total Flow-Through for the LNP Flow-Through Report contains all of the LNP
12 LSRs that are submitted electronically by a CLEC that flow-through and reach a
13 status for a FOC to be issued *without manual intervention*. Partially Mechanized
14 LSRs are subject to some level of manual intervention. By including Partially
15 Mechanized LSRs in the Total Flow-Through for the LNP Flow-Through Report,
16 BellSouth's LNP flow-through performance is artificially inflated.

17 **Q. WHY IS FOC TIMELINESS IMPORTANT?**

18 **A.** The receipt of timely Fully Mechanized FOC's is a critical component in a
19 CLECs' ability to process requests for service in a timely manner. If the return of
20 a FOC is delayed, CLECs' ability to complete orders in a timely manner is
21 negatively impacted. Timely order completion weighs heavily on customer
22 satisfaction, and therefore on CLECs' ability to compete. Accordingly, under the

1 SQM, BellSouth should return at least 95% of Fully Mechanized FOCs to CLECs
2 within three (3) hours of the LSR. The standard for Partially Mechanized FOCs is
3 85% within ten (10) business hours.⁶

4 **Q. WHAT WOULD BE THE IMPACT OF MISCATEGORIZING FULLY**
5 **MECHANIZED LSRS AS PARTIALLY MECHANIZED LSRS ON THE**
6 **FOC TIMELINESS REPORT?**

7 **A.** By miscategorizing Fully Mechanized LSRS as Partially Mechanized LSRS for the
8 FOC Timeliness Report, the Fully Mechanized LSRS would be subject to a less
9 stringent standard than the standard set in the SQM. Accordingly, deficiencies in
10 BellSouth's performance for Fully Mechanized FOC Timeliness would be
11 masked. If the LSRS are Fully Mechanized, they should be held to the appropriate
12 Fully Mechanized standard.

13 **Q. HAS BELL SOUTH ADDRESSED THIS ISSUE?**

14 **A.** Not yet. In the Florida third-party test, it was determined that KPMG's orders
15 were classified as flowing-through on the Flow-Through Report, thereby leading
16 KPMG to expect Fully Mechanized FOCs. KPMG issued Observation 184,
17 attached as Exhibit KCT-25 to my testimony, because they were not receiving
18 timely Fully Mechanized FOCs. However, according to BellSouth's response to
19 Observation 184, BellSouth believes that the partially mechanized standard
20 should be used to evaluate the timeliness of these FOCs. (See Exhibit KCT-25.)
21 BellSouth also admits that KPMG's weekly Flow-Through Report indicates flow-

⁶ These are the standards found in BellSouth's proposed Interim SQM Plan. Under the standards ordered by the Authority in Tennessee, 95% of Fully Mechanized FOCs should be returned to CLECs within one (1) hour and 85% of Partially Mechanized FOCs within five (5) hours.

1 through for the LSRs at issue in Observation 184 and that a Test Director entry,
2 an entry on BellSouth's metrics change tracking database, will be used to address
3 this issue. It is unclear what BellSouth views as the "issue" that needs to be
4 addressed when BellSouth indicates in its response that the partially mechanized
5 standard is appropriate for LSRs that flow-through. Moreover, it is unclear what,
6 if any, change to BellSouth's metrics is being proposed to deal with this issue.
7 The important fact is that KPMG, like AT&T, had orders that were indicated as
8 flowing-through or fully mechanized on one report, but classified (according to
9 BellSouth) as partially mechanized for another report.

10 **Q. HAVE YOU IDENTIFIED ANY OTHER INSTANCES WHERE**
11 **BELLSOUTH'S REPORTS MAY SHOW SATISFACTORY RESULTS**
12 **WHEN BELLSOUTH'S PERFORMANCE IS NOT SATISFACTORY?**

13 **A.** Yes. Comparison of the LNP Flow-Through raw data with the raw data for the
14 LNP Reject measures in PMAP indicates that 133 out of 514 auto clarified LSRs
15 in the LNP LSR Flow-Through Log appear as Partially Mechanized in the LNP
16 Reject raw data, rather than Fully Mechanized.

17 **Q. WHAT IS AN AUTO CLARIFICATION?**

18 **A.** According to BellSouth's SQM, "[a]n Auto Clarification is a valid LSR which is
19 electronically submitted (via EDI or TAG), but is rejected Auto
20 Clarifications are returned without manual intervention." (Exhibit KCT-26.)

21 **Q. WHY IS THIS DISCREPANCY SIGNIFICANT?**

22 **A.** Over 25% of the auto clarified LSRs in the LNP Flow-Through Log appear as
23 Partially Mechanized in the LNP Reject raw data. Similar to the last issue I

discussed regarding LNP flow-through and the FOC Timeliness Report in PMAP, BellSouth is either (1) overstating its LNP flow-through, or (2) miscategorizing Fully Mechanized LSRs as Partially Mechanized LSRs in its LNP Reject data. Similar to FOC Timeliness, Partially Mechanized LSRs are subject to a less stringent standard than Fully Mechanized LSRs for the Reject Interval Measure.

Q. HAVE YOU IDENTIFIED ANY OTHER INSTANCES WHERE BELLSOUTH'S REPORTS MAY BE DISTORTED?

A. Yes. BellSouth improperly includes test servers and back-up servers in its calculations for the Interface Availability Measure, artificially inflating its performance for this measure.

Q. WHAT DOES THE INTERFACE AVAILABILITY MEASURE REPORT?

A. The Interface Availability Measure tracks outages that could impact CLECs' ability to conduct business using BellSouth's interfaces. CLECs are dependent upon BellSouth's ordering interfaces - EDI, LENS, and TAG - to place their orders with BellSouth. When these systems are slow, or when the systems experience outages, CLECs' ability to order products and services from BellSouth is severely limited. The availability of BellSouth's interfaces is critical to competition in Tennessee.

Q. HOW DOES BELLSOUTH ARTIFICIALLY INFLATE ITS PERFORMANCE FOR THE INTERFACE AVAILABILITY MEASURE?

A. The Interface Availability Measure shows the percentage of hours that BellSouth's Interfaces are available for CLECs to use in conducting business with BellSouth. The calculation is a simple one – the number of hours BellSouth's

1 interfaces were not available divided by the total number of available hours. In
2 proceedings before the Louisiana Public Service Commission, BellSouth admitted
3 that it adds the hours of service that its test servers and back-up servers are
4 available to the denominator of the Interface Availability Measure calculation.
5 *See, e.g.* BellSouth Telecommunications, Inc.'s Supplemental Response To
6 Action Item 23, Parts 6 & 7, filed with the Louisiana Public Service Commission,
7 Dckt. No. U-22252, Subdckt. C (May 30, 2002) (proprietary document not
8 attached as exhibit, available upon request).

9 **Q. IS IT APPROPRIATE FOR THE HOURS BELLSOUTH'S TEST**
10 **SERVERS AND BACK-UP SERVERS ARE "AVAILABLE" TO BE**
11 **INCLUDED IN THE INTERFACE AVAILABILITY MEASURE?**

12 **A.** No. BellSouth's test servers and back-up servers are not used to process CLEC
13 orders. By adding the hours these servers are up and running, BellSouth
14 artificially inflates the denominator of the Interface Availability Measure. By
15 artificially inflating the denominator, deficiencies in BellSouth's performance are
16 hidden because the % of available hours is diluted.

17 **C. BellSouth Is Uncooperative And Unresponsive When AT&T Attempts**
18 **To Resolve Discrepancies In BellSouth's Data**

19 **Q. DOES AT&T INFORM BELLSOUTH WHEN IT HAS PROBLEMS**
20 **RECONCILING BELLSOUTH'S DATA?**

21 **A.** Yes. AT&T has repeatedly contacted BellSouth for assistance in resolving data
22 integrity problems. I have attached as Exhibit KCT-27 to my testimony several
23 recent examples of letters and emails AT&T has sent to BellSouth in an attempt to
24 resolve discrepancies in BellSouth's performance data and reports.

1 **Q. DOES BELLSOUTH PROVIDE TIMELY RESPONSES TO AT&T'S**
2 **INQUIRIES?**

3 **A.** No. AT&T often encounters lengthy delays in receiving responses from
4 BellSouth. Prior to January 2002, AT&T addressed all data integrity issues to the
5 AT&T BellSouth Account Team. During 2000 and 2001, AT&T experienced
6 lengthy delays in obtaining responses from BellSouth. During the last half of
7 2000 it took an average of almost six (6) weeks for BellSouth to respond to
8 AT&T's data integrity questions. In 2001 the average length of time for AT&T to
9 receive a response increased to over seven (7) weeks. One response took over
10 twenty-four (24) weeks.

11 **Q. DOES AT&T CONTINUE TO ADDRESS ITS DATA INTEGRITY**
12 **CONCERNS TO THE AT&T BELLSOUTH ACCOUNT TEAM?**

13 **A.** No. In January 2002 BellSouth's reorganized its support for CLECs. AT&T now
14 addresses its data integrity questions and requests for root cause analysis to the
15 BellSouth PMAP Team. Specifically, AT&T addresses its data integrity concerns
16 to Philip Porter, Manager – CLEC Interface Performance Measures.

17 **Q. DOES AT&T CONTINUE TO EXPERIENCE LENGTHY DELAYS IN**
18 **RECEIVING RESPONSES FROM BELLSOUTH TO ITS DATA**
19 **INTEGRITY CONCERNS?**

20 **A.** Yes. BellSouth initially provided some prompt responses. In March 2002,
21 however, Philip Porter of BellSouth indicated that all future responses from his
22 team would be filtered through BellSouth's External Response Team. Since that
23 time, BellSouth's responses have been untimely. In addition, when answers
24 cannot be obtained quickly, BellSouth refuses to provide a timeframe when
25 AT&T can expect a response. (*See Exhibit KCT-28.*)

1 **Q. WHEN BELLSOUTH DOES RESPOND TO AT&T'S DATA INTEGRITY**
2 **QUESTIONS, WHAT IS THE QUALITY OF ITS RESPONSE?**

3 **A.** BellSouth's responses are often times less than satisfactory. Let me provide an
4 example. E.D. Charles Analytics, on behalf of AT&T, initiated a data integrity
5 issue regarding discrepancies between the number of LSRs in the LNP Flow-
6 Through Report and other LNP ordering reports on February 12, 2002. (See
7 Exhibit KCT-29.) The table below shows the exact discrepancies, or gaps in the
8 data, that were of concern to AT&T.

9 **Comparison of the Number of LSRs in the LNP Flow-Through Report**
10 **and Other LNP Reports Found in PMAP**

| AT&T Broadband LNP Total LSR Count | | | | |
|------------------------------------|---------------|----------|--------------|----------|
| | December 2001 | | January 2002 | |
| | OCN 7170 | OCN 7562 | OCN 7170 | OCN 7562 |
| LNP Flow-through | 2,526 | 2,601 | 2,804 | 5,150 |
| PMAP Reports | 1,859 | 2,290 | 2,322 | 3,915 |
| Gaps | 667 | 311 | 482 | 1,235 |
| | 26% | 12% | 17% | 24% |

11 Several months later, after numerous inquiries, AT&T has still not received an
12 adequate response from BellSouth explaining these discrepancies. (See Exhibit
13 KCT-30, escalation letter from Denise Berger to Jim Schenk of May 17, 2002; see
14 also Exhibit KCT-31, letter from Denise Berger to Philip Porter of June 25,
15 2002.)

16 **Q. PLEASE DESCRIBE HOW BELLSOUTH'S RESPONSE HAS BEEN**
17 **INADEQUATE.**

18 **A.** The inadequacies of BellSouth's response to Mr. Charles' inquiry and the lack of
19 cooperation from BellSouth in resolving data integrity issues are evident in a
20 letter to Denise Berger from Philip Porter on June 17, 2002. (See Exhibit KCT-

1 32.) Mr. Porter dismissed AT&T's inquiries and indicated that "attempts to
2 compare data points on the various reports are futile since different exclusions and
3 business rules apply to each report." (*Id.*) Mr. Porter then referred AT&T to the
4 SQM and raw data users manual to ascertain the different business rules that
5 would account for the discrepancies Mr. Charles identified in February. (*Id.*)

6 **Q. WHY IS BELLSOUTH'S RESPONSE INADEQUATE?**

7 **A.** BellSouth's response is wholly inadequate and without substance because AT&T
8 is fully aware of BellSouth's published business rules and had already applied
9 these rules before comparing reports. BellSouth, however, as I have already
10 discussed, often applies undocumented exclusions and business rules to its data.
11 Although BellSouth dismisses these types of data integrity questions as a
12 "continual rehashing of the same issues," AT&T is left with no alternative but to
13 keep asking the questions until a satisfactory and substantive answer is obtained.
14 (*Id.*) Until BellSouth adheres to its SQM, AT&T will continue to find
15 inexplicable discrepancies in BellSouth's data. Data reconciliation is critical to
16 CLECs' and the Authority's ability to verify the accuracy of BellSouth's
17 performance data and reports. Data and reports that cannot be verified are
18 unreliable.

19 **III. THIRD-PARTY AUDITS HAVE RAISED QUESTIONS CONCERNING**
20 **THE RELIABILITY OF BELLSOUTH'S DATA**

21 **Q. ARE BELLSOUTH'S SELF-REPORTED PERFORMANCE DATA**
22 **CURRENTLY BEING AUDITED?**

23 **A.** Yes, in Georgia and Florida.

1 **Q. HOW DOES BELLSOUTH’S RECENT CHANGE FROM PMAP 2.6 TO**
2 **PMAP 4.0 IMPACT THESE AUDITS?**

3 **A.** In both Georgia and Florida, KPMG’s data integrity testing was largely suspended
4 from January through April while BellSouth switched from PMAP 2.6 to PMAP
5 4.0.

6 **Q. WILL ANY FURTHER TESTING BE CONDUCTED IN PMAP 4.0?**

7 **A.** Yes. The audits are now being conducted in the new PMAP 4.0 environment. All
8 74 Georgia metrics will be reviewed in the PMAP 4.0 environment.

9 **Q. PLEASE DESCRIBE THE ANALYSIS THAT WILL BE CONDUCTED IN**
10 **THE PMAP 4.0 ENVIRONMENT.**

11 **A.** The analysis in PMAP 4.0 will begin with a comparison of data from BellSouth’s
12 Legacy/Source Systems to the data captured in the Regulatory Ad-Hoc Database
13 System (RADS). Sixteen (16) legacy/source systems will be reviewed as part of
14 this process. Only four of these system reviews have been completed. After a
15 particular legacy system review is complete, KPMG will then compare the RADS
16 tables to the tables found in PMAP 4.0. Because only four of the legacy system
17 reviews have been completed, this second step is currently available for only four
18 (4) of the sixteen (16) legacy systems. Lastly, KPMG will compare the PMAP
19 4.0 data warehouse to BellSouth’s reports.

20 **Q. DOES THE IMPLEMENTATION OF PMAP 4.0 IMPACT KPMG’S DATA**
21 **INTEGRITY AUDITS IN ANY OTHER WAY?**

22 **A.** Yes. KPMG is currently evaluating whether forty-two (42) manual sub-metrics
23 will require additional testing in PMAP 4.0. These metrics were completed in the
24 PMAP 2.6 environment. In addition, KPMG had issued three exceptions for the

1 PMAP 2.6 environment prior to the changeover to PMAP 4.0. These exceptions
2 will now be tested in the PMAP 4.0 environment.

3 **Q. HAVE AUDITS OF BELL SOUTH'S PERFORMANCE DATA REVEALED**
4 **DATA INTEGRITY ISSUES?**

5 **A.** Yes. In Florida, 19 Observations and Exceptions related to performance measures
6 remain open as of June 26, 2002. (*See* Exhibit KCT-33.) In Georgia, KPMG has
7 issued three Exceptions for the PMAP 2.6 environment. Outstanding PMAP 2.6
8 Exceptions will be tested in PMAP 4.0.

9 **Q. HAVE KPMG'S AUDITS OF BELL SOUTH'S PERFORMANCE**
10 **MEASURES REVEALED ANY OF THE SAME TYPES OF CONCERNS**
11 **YOU HAVE IDENTIFIED HERE TODAY?**

12 **A.** Yes. For example, in Florida KPMG recently issued Observation 206 and
13 Exception 124 remains open. (*See* Exhibits KCT-34 and KCT-35.) KPMG
14 issued both Observation 206 and Exception 124 because KPMG's calculations
15 using data provided by BellSouth resulted in different values than those reported
16 by BellSouth in its performance reports. (*Id.*) As KPMG points out, the
17 "inability to replicate report values signifies that the accuracy [of a particular
18 report] may be in question." (Exhibit KCT-34 at 2; Exhibit KCT-35 at 6.) In
19 KPMG's view, "[w]ithout accurate SQMs, CLECs may be unable to assess the
20 quality of service received or plan for future business activities reliably." (*Id.*)

21 **Q. HAVE KPMG'S AUDITS REVEALED ANY OTHER DATA INTEGRITY**
22 **CONCERNS SIMILAR TO THOSE YOU HAVE RAISED TODAY?**

23 **A.** Yes. Exceptions 114, 143, and 145 were issued because KPMG found that
24 BellSouth inappropriately excluded data from the data it uses to calculate its

1 metrics. (See Exhibits KCT-36 through KCT-38.) KPMG found that if BellSouth
2 inappropriately excludes records from its calculations for a particular measure,
3 “the reported values may not accurately reflect the actual quality of service
4 provided.” (E.g., Exhibit KCT-36 at 2.) For example, if BellSouth
5 inappropriately excludes records that should be included in calculating FOC
6 Timeliness, the reported values would not be an accurate reflection of the time it
7 takes BellSouth to return FOCs. (Exhibit KCT-36.)

8 **Q. WHAT IS THE CURRENT STATUS OF THE GEORGIA AND FLORIDA**
9 **PERFORMANCE METRICS AUDITS?**

10 **A.** According to KPMG’s latest status report in Florida, the audit for Florida will not
11 be complete until the end of September at the earliest. KPMG has not provided
12 any recent project timelines for Georgia, but it has indicated on status calls that
13 the timeline is the same for both Georgia and Florida.

14 **Q. WHY ARE AUDITS IMPORTANT?**

15 **A.** A complete analysis of BellSouth’s data is a critical step in determining whether
16 BellSouth’s data are reliable.

17 **Q. SHOULD THE AUTHORITY RELY ON THE DATA BELLSOUTH HAS**
18 **SUBMITTED FOR PURPOSES OF EVALUATING WHETHER**
19 **BELLSOUTH PROVIDES NONDISCRIMINATORY ACCESS IN**
20 **TENNESSEE?**

21 **A.** No. Inconsistencies between reports and the discovery of undocumented business
22 rules and exclusions call into question the performance reports BellSouth submits.
23 Furthermore, scrutiny of the data by independent third-party audits ordered by the
24 Georgia and Florida Commissions is not yet complete. Audits of BellSouth’s data

1 in the new PMAP 4.0 environment has just barely begun. In sum, the data
2 BellSouth has presented are simply not reliable, accurate, or complete.

3 **Q. ARE THE METRICS ORDERED BY THE AUTHORITY IN TENNESSEE**
4 **CURRENTLY BEING AUDITED?**

5 **A.** No. The Georgia and Florida audits review BellSouth's data under the metrics
6 ordered by each of those states. To the extent the metrics ordered by the
7 Authority differ from those metrics – for example, differing levels of
8 disaggregation or state-specific data – those different metrics are not currently
9 being audited by KPMG or any other third-party tester.⁷ The only way of
10 assessing whether BellSouth's data produced under the Tennessee SQM is
11 reliable is to evaluate at least three (3) months data produced under the Tennessee
12 SQM - after BellSouth's systems have been reprogrammed to collect and report
13 the data and proper business rules have been established – and to subject such
14 data to the scrutiny of a third-party audit. Only then can the Authority be assured
15 that BellSouth's performance data and reports are accurate and reliable in
16 Tennessee

⁷ The testimony of Cheryl Bursh discusses the importance of evaluating data collected and produced in accordance with the Tennessee SQM before making a determination on BellSouth's compliance with the Act in Tennessee.

1 **IV. BELLSOUTH'S SELF-REPORTED DATA REVEAL DEFICIENT**
2 **PERFORMANCE**

3 **Q. SETTING ASIDE FOR A MOMENT THE CONCERNS ABOUT THE**
4 **ACCURACY OF THE DATA, DO BELLSOUTH'S MONTHLY STATE**
5 **SUMMARY ("MSS") REPORTS FOR TENNESSEE INDICATE**
6 **DEFICIENT PERFORMANCE?**

7 **A.** Yes. The latest data that BellSouth submitted to the Authority was for January
8 2002. I have attached BellSouth's MSS report for March 2002 as Exhibit KCT-
9 39 to my testimony. In March 2002, BellSouth failed the comparison criteria for
10 100 sub-metrics or 12.3 % of the sub-metrics in which there was both CLEC
11 activity in Tennessee and a performance standard. Thus, BellSouth continues to
12 be non-compliant with its SQM.

13 **Q. ARE BELLSOUTH'S MSS REPORTS INDICATIVE OF BELLSOUTH'S**
14 **PERFORMANCE IN TENNESSEE?**

15 **A.** Not likely. BellSouth's March 2002 MSS report for Tennessee, the latest
16 available, is based on BellSouth's Proposed Interim SQM, not the measures
17 ordered by the Authority. As discussed further in the testimony of Cheryl Bursh,
18 the measures ordered by the Authority in Tennessee offer greater levels of
19 disaggregation, more state-specific measures, and more stringent standards of
20 performance. Because aggregate data and regional data can easily mask deficient
21 performance, it is likely that BellSouth's level of non-compliance with the
22 Tennessee SQM would be even greater than the level of non-compliance shown in
23 BellSouth's latest available MSS report for March 2002.

1 **Q. HAVE YOU IDENTIFIED ANY TRENDS IN BELL SOUTH'S**
2 **PERFORMANCE?**

3 **A.** Yes. According to BellSouth's MSS reports, BellSouth's performance declined
4 from January to March 2002 on approximately 27% of the performance measures
5 that BellSouth reports in its MSS report for Tennessee for those non-diagnostic
6 measures in which there was CLEC activity. I have created a matrix to show this
7 trend, broken down by the categories in the MSS report. Table I below compares
8 BellSouth's performance in Tennessee from January and March for all measures
9 which had activity for both months, excluding diagnostic measures.

10 **Table I**
11 **Comparison of BellSouth's January and March Performance in Tennessee**

| | "Worse" | "Same or Improving" | Total | % "Worse" |
|--------------|------------|---------------------|------------|---------------|
| Resale | 52 | 115 | 167 | 31.14% |
| UNE | 113 | 330 | 443 | 25.51% |
| LIT | 4 | 22 | 26 | 15.38% |
| OSS | 17 | 67 | 84 | 20.24% |
| Collocation | 2 | 3 | 5 | 40.00% |
| General | 20 | 21 | 41 | 48.78% |
| Total | 208 | 558 | 766 | 27.15% |

12
13 The underlying data for my calculations is included as Exhibit KCT-40 to my
14 testimony.

15 **Q. DID YOU DO FURTHER ANALYSIS USING A "BUFFER" FOR LESS**
16 **SIGNIFICANT DECLINES IN PERFORMANCE?**

17 **A.** Yes. I compared BellSouth's performance in Tennessee for January and March
18 2002, using the same universe of measures – those measures where there was
19 activity for both months, excluding diagnostic measures – but I added a 5%
20 "buffer." In other words, BellSouth's performance in March had to decline by

1 more than 5% before I counted that measure as “worse” than January’s
2 performance.

3 **Q. IS A 5% DECLINE IN PERFORMANCE SIGNIFICANT?**

4 **A.** Yes. Depending on the level of activity, a 5% decline in performance for a given
5 measure could impact hundreds of CLEC transactions.

6 **Q. WHAT WERE THE RESULTS OF YOUR ANALYSIS?**

7 **A.** BellSouth’s performance declined more than 5% for nearly 17% of the measures
8 in Tennessee from January to March 2002. Table II below shows a breakdown of
9 my results.

10 **Table II**
11 **Comparison of BellSouth’s January and March Performance in Tennessee**
12 **% of Decline Greater than 5%**

| | "Worse" | "Same or Improving" | Total | % "Worse" |
|--------------|------------|---------------------|------------|---------------|
| Resale | 35 | 132 | 167 | 20.96% |
| UNE | 72 | 371 | 443 | 16.25% |
| LIT | 2 | 24 | 26 | 7.69% |
| OSS | 9 | 75 | 84 | 10.71% |
| Collocation | 2 | 3 | 5 | 40.00% |
| General | 8 | 33 | 41 | 19.51% |
| Total | 128 | 638 | 766 | 16.71% |

13

14 **Q. WHY ARE THESE RESULTS IMPORTANT?**

15 **A.** These results show that BellSouth’s performance in Tennessee is declining for a
16 high number of measures in which there was data available.

17 **Q. CAN YOU ADEQUATELY EVALUATE BELL SOUTH’S**
18 **PERFORMANCE IN TENNESSEE FROM ITS MSS REPORTS?**

19 **A.** No. While we have conducted our analysis of BellSouth’s performance data
20 based on the data BellSouth filed in Tennessee and based on the data available on

1 BellSouth's website, this data provides only limited information regarding
2 BellSouth's actual performance in Tennessee. According to BellSouth's MSS
3 reports for Tennessee, there is no data or a statistically inconclusive amount of
4 data for a substantial number of performance metrics.

5 **Q. DID YOU EXAMINE EXACTLY HOW MANY SUB-METRICS HAVE NO**
6 **DATA OR A STATISTICALLY INCONCLUSIVE AMOUNT OF DATA IN**
7 **THE TENNESSEE MSS REPORT?**

8 **A.** Yes. I have attached as Exhibit KCT-41 to my testimony a listing of the
9 Tennessee sub-metrics for January 2002 that have no data or a statistically
10 inconclusive amount of activity, according to BellSouth's own definition of less
11 than 30 transactions. There were 1,011 sub-metrics which fall into this category
12 out of a total number of 1,411 sub-metrics (excluding diagnostics).

13 **Q. WHAT IS THE IMPACT OF BELL SOUTH'S FAILURE TO PROVIDE**
14 **ANY DATA OR STATISTICALLY CONCLUSIVE DATA FOR 1,011 SUB-**
15 **METRICS?**

16 **A.** The end result is that BellSouth has provided the Authority with no credible
17 evidence regarding its performance for 72% of its measures. Thus, BellSouth has
18 provided no evidence regarding BellSouth's level of performance for many
19 important wholesale services. Let me give an example. No collocation measures
20 in Tennessee had enough volume to provide a statistically conclusive evaluation
21 of BellSouth's performance. Similarly, Local Interconnection Trunk measures
22 like Reject Interval, FOC Timeliness, Order Completion Interval, and Percent
23 Missed Installation Appointments did not have a statistically valid number of
24 transactions. By BellSouth witness Varner's own admission, if a measure has less
25 than 30 observations it does not provide a statistically valid indication of

1 BellSouth's performance. *See* Varner Direct at 16. Thus, BellSouth has provided
2 no valid evidence of its performance for these and other important measures.

3 **CONCLUSION**
4

5 **Q. ARE THE DATA AND REPORTS BELL SOUTH HAS SUBMITTED TO**
6 **THE AUTHORITY RELIABLE?**

7 **A.** No. For the reasons I have outlined in my testimony, the Authority cannot be
8 reasonably assured that BellSouth's self-reported data are accurate and its
9 performance data and reports reflect BellSouth's actual performance in
10 Tennessee. CLECs currently do not have access to BellSouth's truly raw data
11 records or transactions in order to properly evaluate its data. Indeed, BellSouth
12 unilaterally picks and chooses what data is available to CLECs. Analysis of the
13 data that is available reveals several discrepancies. As a result, BellSouth's data
14 should be subjected to significantly more scrutiny before the Authority can rely
15 on it.

16 **Q. SETTING ASIDE YOUR DATA INTEGRITY CONCERNS, DOES THE**
17 **DATA BELL SOUTH HAS SUBMITTED DEMONSTRATE THAT**
18 **BELL SOUTH HAS MET ITS BURDEN UNDER THE ACT?**

19 **A.** No. BellSouth continues to perform below pre-set standards for many sub-
20 metrics. Indeed, BellSouth's performance declined significantly between January
21 and March 2002 for nearly 17% of the sub-metrics reported in its MSS for
22 Tennessee. Moreover, BellSouth failed to provide sufficient evidence of its
23 performance in Tennessee for 72% of the sub-metrics reported in its MSS report
24 for January 2002 because there was no data or statistically inconclusive data for

1 those sub-metrics. Thus, the data and reports BellSouth has submitted do not
2 show that BellSouth provides nondiscriminatory access under the Act.

3 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

4 **A. Yes.**

5